

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : Chapter 13
Darden, Dolores
: 17-15780
Debtor

**APPLICATION FOR COMPENSATION
AND REIMBURSEMENT OF EXPENSES**

John L. McClain, Esquire applies under § 330 of the Bankruptcy Code for an award of compensation and reimbursement of actual, necessary expenses and represents:

1. Applicant is counsel for the debtor.
2. The debtor filed a petition under chapter 13 of the Bankruptcy Code on 8/28/2017.
3. The debtor's annualized current monthly income as set forth on Form B22C is below median (the amount on line 15 is less than the amount on line 16).
4. All services rendered and expenses incurred for which compensation or reimbursement is requested were performed or incurred for or on behalf of the debtor, the services and expenses were actual and necessary, and the compensation requested for those services is reasonable.
5. Applicant requests an award of compensation of \$8,500.00 for 34.3 hours expended on the initial consultation with client and in providing before confirmation (i) the customary services of counseling and representing the chapter 13 debtor in connection with the analysis of the financial situation; preparation, review and filing with the court of all required documents; correspondence, telephone conversations and miscellaneous contact with creditors, the trustee, attorneys and other parties in interest; preparation for and attendance at 341(a) meeting. They include the services listed below:
 - (a) Preparation and electronic filing of petition, schedules, supplemental local forms, Chapter 13 Plan and mailing matrix.
 - (b) Drafting and mailing notice to creditors advising of filing of case, including a copy of your Chapter 13 Plan.
 - (c) Drafting and mailing to you a letter regarding your attendance at the Section 341 meeting and your other responsibilities.
 - (d) Preparation for and attendance at Section 341 meeting.
 - (e) Review of order confirming plan and periodic case status reports from the Chapter 13 trustee.
 - (f) Review of trustee's motion for allowance of claims.
 - (g) Maintaining custody and control of case files.
 - (h) Service of orders on all affected parties.
 - (i) Verification of your identity and social security number.

(j) Defending objections to confirmation of your Chapter 13 Plan.

and (ii) in representing the debtor(s) in connection with the following services to the extent they are requested or reasonably necessary for effective representation:

- Utility shut off notice (PECO/involved additional correspondence with client and creditor);
- 60 month plan to stop **MONTCO tax sale 9/21**;
- Motion to Pay plan payment by way of wage order (amended wage order also filed commensurate with amended plan filed);
- Motion to Extend (Order entered on CNO);
- Motion to dismiss filed (eventually withdrawn upon confirmation of case);
- federal tax claim issue;
- student loans;
- Motions to avoid lien filed vs. Regina Nursing Home;/ Delay in filing due to delay in obtaining FMV appraisal of real property; a response and objection were filed by creditor; this also caused delays in case with high volume of required correspondence with court, trustee and counsel; hearing held and creditor eventually filed praecipe to withdraw objection; Order entered on CNO; and
- Amendment to Plan filed.

6. Applicant's supplement to paragraph five with a description of those matters, whether or not they are listed in paragraph 5, that took an unusual amount of time to complete or involved complex legal or factual issues. The following is a copy of Applicants time records setting forth the dates and amount of time expended for the services performed on behalf of the debtor:

7/18/17 Telephone consultation with debtor regarding financial issues and bankruptcy options. Discussed MONTCO tax sale 9/21. Update file. John L. McClain, Esq.: .6 hours.

8/19/17 Receive and review letter from debtor with basic explanation of circumstances and information. Update file. John L. McClain, Esq.: .2 hours.

8/19/17 Receive and review credit counseling. Update file. John L. McClain, Esq.: .1 hours.

8/24/17 Prepare and send Debtor appointment letter explaining documents required with instructions. Update file. John L. McClain, Esq.: .2 hours.

8/26/17 Review, prepare for and set up debtor's file for first office consultation. Conduct online Home appraisal did not reflect true FMV will need professional appraisal; Docket search (prior bk for Debtor and her husband); docket search Montco.; and save access client file. John L. McClain, Esquire: 2.1 hours.

8/26/17 Met with client for consultation. Discussed all issues and aspects of case. Discussed sheriff's sale scheduled. Contacted professional appraiser by telephone and discuss FMV issues. John L. McClain, Esquire: .8 hours.

8/26/17 Prepare all documents associated with client's petition (petition and schedules, means test and plan) as well as discussed the same with client. John L. McClain, Esquire: .7 hours.

8/26/17 Met with client for consultation with John L. McClain. Review entire petition with client for corrections and execution, review list of client's obligations and resolve all questions with client. Associate Attorney: .75 hours (Hours discounted).

8/28/17 Filed all documents associated with client petition with court. John L. McClain, Esquire: .2 hours

8/28/17 Prepare letter and forward to Sheriff's Department (Montco. Tax Sale 9/21/17). John L. McClain, Esquire: .1 hours

8/26/17 Prepare and send letter to IRS regarding Transcript request. John L. McClain, Esquire: .1 hours

8/28/17 Prepare letter to client re: payment obligations and/or trustee payments labels to client. John L. McClain, Esquire: .2 hours.

8/28/17 Receive and review notice FREDERICK L. REIGLE added to case. Update file. Associate Attorney: .1 hours.

8/28/17 Prepare motion to pay and file with court. Prepare letter and attach copy of same and send to clients employer. John L. McClain, Esquire: .2 hours.

8/29/17 Prepare and file Motion to Extend Automatic Stay. Serve same. Update file. Associate Attorney: .8 hours.

8/29/17 Prepare and send letter to client with attached copy of the motion to extend automatic stay filed with explanations and instructions. Update file. Associate Attorney: .2 hours.

8/30/17 Receive and review Order Directing Employer To Make Wage Deductions For Remittance To Trustee. Update file. John L. McClain, Esq.: .1 hours.

8/31/17 Prepare and send letter with attached wage order to Debtor's employer. Update file. John L. McClain, Esq.: .1 hours.

9/1/17 Receive and review proof of claim filed by AmeriCredit Financial Services, Inc. dba GM Financial. Update file. Associate Attorney: .1 hours.

9/8/17 Review notice of case hearings and deadline. Letter to client re: 341 hearing. Update file notes. John L. McClain, Esquire: .2 hours.

9/8/17 Prepare redacted required documents and send same via upload to trustee (documents included 2016 tax returns; Pay advices; Homeowner's Insurance; and Current bank balance).. John L. McClain, Esquire: .2 hours.

9/8/17 Receive and review Notice of Appearance and Request for Notice by MICHAEL D. VAGNONI Filed by MICHAEL D. VAGNONI on behalf of Montgomery County Tax Claim Bureau. Update file. Associate Attorney: .1 hours.

9/12/17 Client called 2 x and l/m re: tax sale notices still being received and missing tax return issues. Call and left detailed message back with client re: same. NO TAX sale; in fact MONTCO filed a claim and is aware of BK. Update file. Associate Attorney: .2 hours.

9/12/17 Receive and review proof of claim filed by Montgomery County Tax Claim Bureau c/o Northeast Revenue Service. Update file. Associate Attorney: .2 hours.

9/14/17 Prepare and file CNO to Motion to Extend. Update file. Associate Attorney: .2 hours.

9/14/17 Receive and review Order Granting Motion to Extend Automatic Stay. Update file. Associate Attorney: .1 hours.

9/14/17 Receive and review proof of claim filed by IRS/ Special Procedures. Update file. Associate Attorney: .2 hours.

9/16/17 Telephone conference. Client called requesting info about original filing. resent original email of 8/28/17. Update file. John L. McClain, Esq.: .2 hours.

9/20/17 Telephone conference. Client called and discussed issues with Peco; Peco fax info and 10 day shut off notice for 9/27/17. Update file. Associate Attorney: .2 hours.

9/20/17 Prepare and send letter to PECO with attached notice of bk. per client's request. Update file. Associate Attorney: .2 hours.

9/29/17 Receive and review notice Case reassigned to Judge Jean K. FitzSimon Involvement of Judge Stephen Raslavich Terminated . Update file. Associate Attorney: .1 hours.

10/03/17 Receive and review Creditor Request for Notices Filed by AmeriCredit Financial Services, Inc. A/C dba GM Financial. Update file. Associate Attorney: .1 hours.

10/3/17 Receive and review 2 proof of claims filed by Navient Solutions, LLC. on behalf of Educational Credit Management Corporation. Update file. Associate Attorney: .2 hours.

10/4/17 Receive and review Debtor Education Financial Management Course Certificate Filed for Debtor. Update file. Associate Attorney: .1 hours.

October 09, 2017 letter from client with questions about case. Update file. John L. McClain, Esq.: .1 hours.

10/9/17 Prepare and send client letter re; office contact info. Update file. John L. McClain, Esq.: .1 hours.

10/9/17 Telephone conference. Client called. Update file. Associate Attorney: .2 hours.

10/9/17 Receive and review proof of claim filed by Massey's c/o Creditors Bankruptcy Service. Update file. Associate Attorney: .1 hours.

10/10/17 Prepare case for 341 hearing. Conference with client re: 341 hearing, and case issues. Updated file. Associate Attorney: .3 hours

10/13/17 Met with client prior to the 341 hearing. Discussed status of professional appraisal on home; attended 341 hearing. Polly Langdon, Esq conducted so only follow up was that client need to provide proof of real estate value. Client understood. Update notes in client's file re: same upon return to office. Associate Attorney: 2.6 hours

10/20/17 Receive and review letter from counsel Woods for Norristown with attached POC and letter. Update file. Associate Attorney: .1 hours.

10/20/17 Receive and review Notice of Appearance and Request for Notice And Service of Papers by JAMES RANDOLPH WOOD on behalf of Municipality of Norristown. Update file. Associate Attorney: .1 hours.

10/20/17 Receive and review proof of claim filed by Municipality of Norristown c/o Portnoff Law Associates, Ltd. Update file. Associate Attorney: .2 hours.

11/3/17 Receive and review proof of claim filed by PECO Energy Company. Update file. Associate Attorney: .1 hours.

11/3/17 Receive and review 2 proof of claims filed by Verizon by American InfoSource LP as agent. Update file. Associate Attorney: .2 hours.

11/7/17 Receive and review proof of claim filed by Premier Bankcard, Llc Jefferson Capital Systems LLC Assignee. Update file. Associate Attorney: .1 hours.

11/10/17 Receive and review proof of claim filed by Navient Solutions, LLC. on behalf of Department of Education Loan Services. Update file. Associate Attorney: .1 hours.

11/17/17 Receive and review letter from counsel Woods/Norristown re: request for status of amended chapter 13 plan to address its proof of claim. Update file. Associate Attorney: .1 hours.

11/27/17 Telephone conference; Client called; discussed non filing spouse issues and status of professional appraisal on home. Update file. Associate Attorney: .2 hours.

11/30/17 Receive and review notice Hearing Continued on Confirmation. Update file. Associate Attorney: .1 hours.

12/19/17 Receive and review proof of claim filed by LVNV Funding, LLC its successors and assigns as assignee of FFPM Carmel Holdings I, LLC. Update file. Associate Attorney: .1 hours.

1/10/18 Receive and review proof of claim filed by MOUNTAIN TOP SERVICE Williamson and Brown,LLC. Update file. Associate Attorney: .1 hours.

1/17/18 Receive and review Motion to Dismiss Case. feasibility Filed by FREDERICK L. REIGLE Represented by POLLY A. LANGDON. Update file. Associate Attorney: .1 hours.

1/23/18 Telephone conference. Call from client discussed trustee MTD and status on appraisal on home; also discussed status of motion to avoid J. Lien. Update file. Associate Attorney: .2 hours.

1/25/18 Receive and review letter from trustee with attached Trustee's Confirmation Hearing/Post Bar Date Review Memo and Claims Register with notice Confirmation Hearing continued. Update file. Associate Attorney: .1 hours.

1/25/18 Receive and review Memo from trustee re: following issues remain outstanding: Confirmation; Motion to Dismiss filed; Confirmation Hearing continued; Plan is under funded with attached claims register for required funding; Documents requested at 341 meeting are missing: real estate valuation; Appropriate pleading must be filed: Regina Nursing Center (per plan). and Plan pays Montgomery Co TCB a secured claim for \$16,872 @9% for \$21,102.54. Creditor filed a secured claim for \$14,867.36. Digest same and Update file. Associate Attorney: .2 hours.

1/30/18 Prepare for trustee MTD and confirmation. Update file. Associate Attorney: .2 hours.

1/30/18 Prepare and send letter to trustee regarding the scheduled confirmation and trustee motion to dismiss with memo re: status of case issues. cc: debtor and respective counsel. Update file. Associate Attorney: .2 hours.

1/3/18 Receive and review reply letter from trustee re: Confirmation; Forward to client and to counsel. Update file. Associate Attorney: .1 hours.

2/1/18 Receive and review notice Hearing Continued on Confirmation and Hearing Continued on Motion to Dismiss. Update file. Associate Attorney: .1 hours.

2/23/18 Receive and review proof of claim filed by Municipality of Norristown c/o Portnoff Law Associates, Ltd. Update file. Associate Attorney: .2 hours.

2/28/18 Prepare for confirmation hearing. Update file. Associate Attorney: .1 hours.

2/28/18 Prepare and send letter to trustee regarding the scheduled confirmation and trustee motion to dismiss with attached amended plan and memo re: status of case issues. cc: debtor and respective counsel. Update file. Associate Attorney: .2 hours.

2/28/18 Receive and review letter from counsel for MONTCO re: issues with amended plan including explanations and request. Update file. Associate Attorney: .1 hours.

2/28/18 Receive and review letter from trustee re: Confirmation. Update file. Associate Attorney: .1 hours.

3/1/18 Receive and review notice Hearing Continued on Confirmation and Hearing Continued on Motion to Dismiss. Update file. Associate Attorney: .1 hours.

3/2/18 Receive and review letter from counsel for MONTCO re: status of confirmation. Update file. Associate Attorney: .1 hours.

3/18/18 Receive and review letter from counsel for MONTCO re: request for status on 2nd amended plan and confirmation scheduled. Update file. Associate Attorney: .1 hours.

3/22/18 Receive and review letter from client re status on HOME FMV appraisal and issues with same. Update file. Associate Attorney: .1 hours.

3/22/18 Receive and review letter from counsel for MONTCO: Following up on past letter re: status of case issues/confirmation. Update file. Associate Attorney: .1 hours.

3/28/18 Receive and review letter from client re: request for alternatives to getting professional appraisal (assessment figures) with a request to advise again on purpose of appraisal; letter also discussed changes in income/work related issues; letter also addressed whether PECO bill and 2017 real estate/school taxes can be included in BK. Update file. Associate Attorney: .1 hours.

3/28/18 Telephone conference. Per my request, client called and discussed case issues: ie: post petition debt issues/ 2017 taxes and Peco bill; also discussed status of FMV appraisal and appraisal vs. tax assessment issues. Update file. Associate Attorney: .3 hours.

3/29/18 Receive and review letter from counsel for MONTCO re: Confirmation hearing, status of amended Plan; and possible objection. Update file. Associate Attorney: .1 hours.

4/2/18 Receive and review letter from MONTCO counsel re: confirmation and status of amended plan. Update file. Associate Attorney: .1 hours.

4/2/18 Telephone conference; Spoke to Peter Trent/Appraiser re: status of appraisal. Update file. Associate Attorney: .1 hours.

4/3/18 Receive and review 2nd letter from MONTCO counsel re: Debtor contacted MCTCB to make arrangements to pay post petition property taxes with request for consent to discuss same w/out violation of the automatic stay. Update file. Associate Attorney: .1 hours.

4/3/18 Prepare and send reply letter to MONTCO counsel re: case issues and status of confirmation. Update file. Associate Attorney: .1 hours.

4/3/18 Prepare and send 2nd reply letter to MONTCO counsel re: consent for Debtor and the MCTCB in making arrangements to pay her post petition 2017 property taxes and/or to pay the post petition taxes. Moreover, that such discussions would not constitute a violation of the automatic stay. cc: Debtor. Update file. Associate Attorney: .2 hours.

4/3/18 Receive and review reply letter from counsel for MONTCO re: post petition tax issue. Update file. Associate Attorney: .1 hours

4/3/18 Prepare and send letter to trustee regarding the scheduled confirmation and trustee motion to dismiss with memo re: status of case issues. cc: debtor and respective counsel. Update file. Associate Attorney: .2 hours.

4/3/18 Receive and review reply letter from trustee re: Confirmation; forward to client and to counsel. Update file. Associate Attorney: .1 hours.

4/3/18 Receive and review reply letter from counsel for MONTCO re: status of confirmation. Update file. Associate Attorney: .1 hours.

4/4/18 Receive and review notice Hearing Continued on Confirmation and Hearing Continued on Motion to Dismiss. Update file. Associate Attorney: .1 hours.

4/10/18 Long Telephone conference. Spoke to client re: post petition issues with MTOCO; changes in her post petition income; and status of FMV appraisal. Update file. Associate Attorney: .3 hours.

4/16/18 Receive and review letter from client per my request re: bankruptcy planning request due to post petition tax and work related issues. Update file. Associate Attorney: .1 hours.

4/18/18 Receive and review letter from client re: more bankruptcy planning and case issues. Update file. Associate Attorney: .1 hours.

4/24/18 Telephone conference; Client called and discussed more bankruptcy planning. Update file. Associate Attorney: .2 hours.

4/25/18 Receive and review letter from counsel for MONTCO re: deadline to object to confirmation – and request for status of confirmation hearing; letter also requests status of amended plan to include MCTCB's statutory 9% interest. Update file. Associate Attorney: .1 hours.

4/25/18 Prepare and send reply letter to MONTCO counsel re: status of case issues including issues with post petition liability issues with MONTCO. Update file. Associate Attorney: .2 hours.

4/25/18 Receive and review reply letter from MONTCO counsel. Update file. Associate Attorney: .1 hours.

4/25/18 Prepare and send follow up letter to MONTCO counsel with request to amend claim to include post petition 2017 MONTCO taxes. Update file. Associate Attorney: .1 hours.

4/25/18 Client called and left message re: keeping in case now. Return client call and left her a message. Update file. Associate Attorney: .1 hours.

4/25/18 Receive and review letter from client with additional questions re: case issues. Update file. Associate Attorney: .1 hours.

4/26/18 Telephone conference. Long discussion with client re: Debtor decided to make arrangements with County for 2017 post petition taxes; discussed terms of and filing a 2nd amended plan; also discussed status of FMV appraisal on home. Update file. Associate Attorney: .4 hours.

**4/26/18 Discussed 2nd amended plan issues with JLM. Update file. Associate Attorney: .2 hours.
John L. McClain, Esq.: .2 hours.**

4/26/18 Prepare and file 2nd amended plan curing issues with Montco. Update file. Associate Attorney: .4 hours.

4/26/18 Prepare and send letter to client per telephone conference today with attached second Amended plan and amended wage order with explanations and instructions; letter also discussed need to make arrangements for a professional appraisal on your home. Update file. Associate Attorney: .2 hours.

4/26/18 Prepare and file amended wage order with court. Update file. Associate Attorney: .3 hours.

4/26/18 Prepare and send follow up letter to MONTCO counsel re: recent discussion about changes with Debtor, re: MONTCO 2017 taxes and attached 2nd Amended Plan with explanations. Update file. Associate Attorney: .2 hours.

4/26/18 Prepare and send letter to trustee regarding the scheduled confirmation and trustee motion to dismiss with attached 2nd amended plan with memo re: status of other case issues. cc: debtor and respective counsel. Update file. Associate Attorney: .2 hours.

4/26/18 Receive and review Amended Order Directing Employer To Make Wage Deductions For Remittance To Trustee. Update file. Associate Attorney: .1 hours.

4/27/18 Receive and review reply letter from MONTCO counsel re: reviewed second amended plan with request for an acknowledgment. Update file. Associate Attorney: .1 hours.

4/30/18 Receive and review letter from trustee re: Confirmation. Update file. Associate Attorney: .1 hours.

5/2/18 Receive and review notice Hearing Continued on Confirmation and Hearing Continued on Motion to Dismiss. Update file. Associate Attorney: .1 hours.

5/11/18 Receive and review client executed amended plan and wage order. Update file. Associate Attorney: .1 hours.

5/25/18 Receive and review letter from appraiser with attached appraisal for Real Property. Update file. Associate Attorney: .1 hours.

6/5/18 Review FMV of real estate/Appraisal. Update file. Associate Attorney: .4 hours.

6/5/18 Prepare and send letter to trustee regarding the scheduled confirmation and trustee motion to dismiss with notice appraisal on Debtors' home was uploaded and memo re: status of case issues. cc: debtor and respective counsel. Update file. Associate Attorney: .2 hours.

6/5/18 Receive and review letter from trustee re: Confirmation. Update file.
Associate Attorney: .1 hours.

6/6/18 Receive and review notice Hearing Continued on Confirmation and Hearing Continued on Motion to Dismiss. Update file. Associate Attorney: .1 hours.

6/21/18 Prepare and file MTAL vs. Regina Nursing Center. serve same. Update file. Associate Attorney: 1.1 hours.

6/21/18 Prepare and send letter to client with attached copy of the motion to avoid the Judgment Lien vs. Regina Nursing Center filed with explanations and instructions. Update file. Associate Attorney: .2 hours.

6/21/18 Receive and review reply letter from client re: MTAL. Update file.
Associate Attorney: .1 hours.

7/5/2018 Receive and review Response to Motion to Avoid Lien Filed by Regina Nursing Center c/o counsel Myer, Rodney. Digest same and update file.
Associate Attorney: .3 hours.

7/5/18 Review response filed to our MTAL with John L. McClain. Update file.
Associate Attorney: .2 hours.
John L. McClain, Esq.: .2 hours.

7/6/18 Prepare and send follow up letter to client with detailed explanations about MTAL issues and response filed with instructions. Update file. Associate Attorney: .2 hours.

7/13/18 Prepare and send letter to counsel for Regina Nursing Center re: MTAL, response filed and request to agree to a continuance of the hearing due to conflicts in schedule. cc: Debtor. Update file. Associate Attorney: .1 hours.

7/13/18 Receive and review letter from counsel for Regina Nursing Center re: consent to 30-day continuance of hearing. Update file. Associate Attorney: .1 hours.

7/13/18 Prepare and send letter to court/Joan re: MTAL vs. Regina Nursing Center scheduled hearing with request matter to be continued. cc: Debtor and counsel. Update file. Associate Attorney: .2 hours.

7/16/18 Receive and review letter from court re: continue Motion to Avoid Lien with Regina Nursing Center to 8/29/18 at 9:30 a.m. Update file. Associate Attorney: .1 hours.

7/16/18 Prepare and send reply letter to court re; Continuance of MTAL hearing. Update file. Associate Attorney: .1 hours.

7/16/18 Prepare and send letter to trustee regarding the scheduled confirmation and trustee motion to dismiss with memo re: status of case issues. cc: debtor and respective counsel. Update file. Associate Attorney: .2 hours.

7/16/18 Receive and review letter from Regina N.C. counsel to court/Ms. Ranieri with inquiry as to whether Judge will continue the July 18, 2018 MTAL hearing. Update file. Associate Attorney: .1 hours.

7/16/18 Receive and review letter from court to counsel for Regina N.C. in response to counsel's inquiry with explanations. Update file. Associate Attorney: .1 hours.

7/17/18 Receive and review letter from trustee re: Confirmation. Update file. Associate Attorney: .1 hours.

7/18/18 Receive and review notice Case reassigned to Trustee William C. Miller Involvement of Trustee Frederick L. Reigle Terminated . Update file. Associate Attorney: .1 hours.

7/18/18 Receive and review notice Hearing Continued on Confirmation and Hearing Continued on Motion to Dismiss. Update file. Associate Attorney: .1 hours.

7/18/18 Receive and review notice Hearing Continued on Motion to Avoid Lien with Regina Nursing Center. Update file. Associate Attorney: .1 hours.

8/20/18 Receive and review letter from client requesting counsel to contact her regarding her case and to discuss issues with non filing spouse. Update file. Associate Attorney: .1 hours.

8/20/18 Prepare and send letter to client in response to nonfiling spouse issues. Update file. Associate Attorney: .1 hours.

8/20/18 Receive and review follow up letter from client with request to discuss case. Update file. Associate Attorney: .1 hours.

8/20/18 CONTACT and l/m for client. Update file. Associate Attorney: .1 hours.

8/20/18 Prepare and send letter to client re: just called to discuss case with available times for return calls. Update file. Associate Attorney: .1 hours.

8/20/18 Receive and review reply letter from client re: available times to discuss case on phone. Update file. Associate Attorney: .1 hours.

8/27/18 Prepare for trustee MTD and confirmation. Also to prep for Motion to avoid lien. Call and left detailed message for client as well. Update file. Associate Attorney: .3 hours.

8/27/18 Prepare and send letter to trustee regarding the scheduled confirmation and trustee motion to dismiss with memo re: status of case issues. cc: debtor and respective counsel. Update file. Associate Attorney: .2 hours.

8/27/8 Telephone conference. Client called and discussed hearing and issues related to MTAL vs. Regina N.C. Update file. Associate Attorney: .3 hours.

8/27/18 Receive and review letter from counsel for Regina Nursing Center re: hearing on Debtor's Motion to Avoid the lien and questions about counsel request for a continuance of the hearing scheduled for tomorrow with further explanations and statement that Respondent does not consent to a continuance regarding the motion to avoid lien. Update file. Associate Attorney: .1 hours.

8/27/18 Receive and review voice mail message from counsel for Regina Nursing Home re: cc emails and request for continuances for confirmation and MTD. Update file. Associate Attorney: .1 hours.

8/27/18 Receive and review letter from trustee re: Confirmation/trustee MTD. Update file. Associate Attorney: .1 hours.

8/28/18 Receive and review letter from counsel: "Did you notify the Court of your request for a continuance of the 8/29/18" MTAL hearing. Update file. Associate Attorney: .1 hours.

8/28/18 Prepare and send reply letter to counsel for Regina re: sorry for delay in response as I was in court and be advised that no request for a continuance of our Motion to Avoid was made and we intend to press the motion tomorrow. Further only a request was made for the Confirmation and trustee motion. Update file. Associate Attorney: .1 hours.

8/28/18 Receive and review reply letter from Regina N.C. counsel re: now Understood continuance issues. Update file. Associate Attorney: .1 hours.

8/29/18 Prepare for and Attend Motion to avoid Llen vs. Regina Nursing Center; appeared before court and put forward motion; opposing counsel appeared as well with 2 members from the Nursing Home; J. made it clear that service was proper and time to object to discharge/exemptions passed. J. continued the hearing to allow counsel to object to the motion. Counsel stated needed to confirm with client but may exercise option to withdraw response/opposition to motion; court gave 1 week to notify counsel of the same. Update file. Associate Attorney: 2.75 hours. (Discounted/Pro Rated with one other case/matter which counsel appeared for at same time).

8/29/18 Receive and review notice Hearing Continued on Confirmation and Hearing Continued on Motion to Dismiss. Update file. Associate Attorney: .1 hours.

8/29/18 Receive and review notice Hearing Continued on Motion to Avoid Lien with Regina Nursing Center. Update file. Associate Attorney: .1 hours.

9/5/18 Receive and review letter from counsel for Regina N.C. re: Regina Nursing Center has decided to not file objections and does not intend to take further action to object to the Motion to Avoid its judicial lien with additional explanations and question. Update file. Associate Attorney: .1 hours.

9/5/18 Receive and review letter from court to creditor/Regina: advisable to withdraw response or put something on the docket which states not objecting to the exemptions and do not intend to further object to the lien. Judge will be notified of intent. Update file. Associate Attorney: .1 hours.

9/5/18 Telephone conference; Call client and discussed update on Motion to avoid the lien hearing. Update file. Associate Attorney: .1 hours.

9/24/18 Prepare and send follow up letter to counsel for Regina N. C. regarding the pending MTAL vs. Regina Nursing Center scheduled with request to file a praecipe to withdraw the response. cc: Debtor, Court and Trustee. Update file. Associate Attorney: .2 hours.

9/24/18 Receive and review reply letter from Regina N.C. counsel re: MTAL response/will file praecipe by tomorrow. Update file. Associate Attorney: .1 hours.

9/25/18 Prepare and send reply letter to counsel re: status of praecipe/MTAL response. Update file. Associate Attorney: .1 hours.

9/25/18 Receive and review letter from Regina N.C. counsel re: MTAL/Response; will e-file the praecipe to withdraw by 12:00 p.m. today. Update file. Associate Attorney: .1 hours.

9/25/18 Receive and review letter from Regina N.C. counsel with attached time stamped copy of Regina Nursing Center's Praecipe to Withdraw/MTAL response. Update file. Associate Attorney: .1 hours.

9/25/18 Prepare and file CNO to MTAL. Update file. Associate Attorney: .2 hours.

9/25/18 Prepare and send letter to court regarding the scheduled hearing on the Motion to Avoid a Judgment Lien vs. Regina Nursing Center with explanations and request to advise if the court will require counsel's appearance. cc: debtors and trustee. Update file. Associate Attorney: .2 hours.

9/25/18 Prepare and send letter to trustee regarding the scheduled confirmation and trustee motion to dismiss with memo re: status of case issues. cc: debtor and respective counsel. Update file. Associate Attorney: .2 hours.

**9/25/18 Receive and review letter from trustee re: will recommend confirmation.
Forward this to court, counsel and to client on 9/26/18 AM. Update file. Associate Attorney: .1 hours.**

7. Applicant requests that compensation be awarded at the following hourly rate: Debtor's retained John L. McClain Esquire and agreed to compensate him and his associate attorney at a rate of \$325.00 per hour for essential bankruptcy services performed.

8. The applicant does not request reimbursement of expenses. and/or (See Attached Receipts) Prior to filing, debtor paid the filing fees and costs associated with the preparation of the instant petition in the amount of \$360 (filing fee \$310 and three bureau credit report \$50).

9. The debtor paid Applicant prior to the filing of the petition \$250.00 toward legal fees.

10. A copy of the Applicant's disclosure of compensation pursuant to Fed. R. Bankr. P.2016(b) executed by the debtor was made a part the debtor's petition filed on 8/28/2017.

11. None of the compensation paid to applicant will be shared with any person other than a member or regular associate of applicant's law firm unless 11 U.S.C. §504(c) applies.

WHEREFORE, Applicant requests an award of \$8,500.00 in compensation and \$0.00 in expenses with unpaid balance of the legal fee of \$8,250.00 and \$0.00 in expenses to be paid through the debtor's chapter 13 Plan through the office of the Chapter 13 Trustee.

Dated:September 26, 2018

Respectfully submitted,

"/s"/Mitchell J. Prince
John L. McClain, Esquire
Mitchell J. Prince, Esquire
John L. Mc Clain and Associates
PO Box 123
Narberth, PA 19072-0123
1-800-McClain (622-5246)
1-888-857-1967 (fax)